## MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway Roseland, New Jersey 07068 (973) 228-9898 Attorneys for Plaintiff

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

XAVIER INGRAM,

Plaintiff,

VS.

COUNTY OF CAMDEN, CAMDEN COUNTY POLICE DEPARTMENT,
JEREMY MERCK, ANTONIO
GENNETTA, NICHOLAS MARCHIAFAVA,
JOHN SCOTT THOMSON, ORLANDO
CUEVAS, JOHN DOE(S) 1-50, and
ABC ENTITIES 1-10,

Defendants.

CIVIL ACTION NO. 1:14-CV-05519

NOTICE OF MOTION FOR RECONSIDERATION

TO: Clerk

**United Stated District Court for the District of New Jersey** 

Mitchell H. Cohen Building & U.S. Courthouse 1 John F. Gerry Plaza, 4th & Cooper Streets Camden, New Jersey 08101

## ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned, on behalf of Plaintiff Xavier Ingram, shall move before the Honorable Juan R. Sanchez, U.S.D.J. for an Order granting reconsideration of the March 22, 2022 Order. Specifically, this Court clearly erred when it dismissed Counts VII and VIII of Plaintiff's Second Amended Complaint as more fully set forth in Plaintiff's moving papers.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely on the attached brief, certification with supporting exhibits, and proposed Order.

PLEASE TAKE FURHTER NOTICE that oral argument is requested.

Respectfully submitted,

MAZIE SLATER KATZ & FREEMAN, LLC

Attorneys for Plaintiff

BY: /s/ Beth G. Baldinger
BETH G. BALDINGER

<u>Dated</u>: April 4, 2022